

December 5, 2007

Dr. Thomas Patterson, Superintendent
Madison Consolidated Schools #3995
2421 Wilson Avenue
Madison, Indiana 47250-2134

Dear Dr. Patterson:

On October 23, 2007, the Indiana Department of Education's (IDOE) monitoring team commenced an on-site monitoring review of the Madison Consolidated Schools' administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Madison Consolidated Schools is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, Madison Consolidated Schools must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank you, Gloria Donovan and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Madison Consolidated Schools to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director
Division of Compensatory Education

cc: Gloria Donovan, Title I Program Administrator
Madison Consolidated Schools #3995

Linda Miller, Assistant Superintendent of Community Relations
and Special Populations, IDOE

**Indiana Department of Education
Title I, Part A Monitoring**

District: Madison Consolidated Schools

Monitoring Date: October 23, 2007

Monitoring Team: Hazel Beasley, Teresa Neely, Lenée' Reedus, Linda Ricketts, Sarah Pies, and Brenda Martz

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of the Madison Consolidated Schools on October 23, 2007. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with professional development requirements	NCLB §1116(a)(1)(D) NCLB §9101(34)
4) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
5) Compliance with district improvement requirements	NCLB §1116(c)
6) Compliance with schoolwide program requirements	NCLB §1114
7) Compliance with targeted assistance program requirements	NCLB §1115
8) Compliance with school ranking and serving requirements	NCLB §1113
9) Compliance with comparability requirement	NCLB §1120A
10) Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521
11) Compliance with equitable	

services to private school students requirements	NCLB §1120
12) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
13) Compliance with supplement, not supplant requirements	NCLB §1120A
14) Compliance with financial management systems requirements	EDGAR §80.20 EDGAR §80.36
15) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
16) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
17) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87
18) Compliance with Neglected Institutes	NCLB §1401
19) Compliance with Delinquent Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from Madison Consolidated Schools at their central office. In addition, IDOE visited E.O Muncie and Lydia Middleton Elementary Schools where interviews were conducted with the principal.

IDOE also reviewed Madison Consolidated Schools' documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals

Background

IDOE interviewed the Title I Program Administrator and building principals. In addition, IDOE reviewed letters to personnel, and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Principal Attestation: Madison Consolidated Schools ensures that the principal of every school receiving Title I funds attests annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual application review, grant approval is not given unless each principal has signed a template attesting that their school is in compliance with the professional qualification requirements of NCLB.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

Professional qualification requirements: Madison Consolidated Schools could not produce evidence demonstrating that teachers currently meet or will meet the highly qualified teacher requirements. Two randomly selected teachers had signed the High Objective Uniform State Standard of Evaluation (HOUSSE). However, the document had not been completed showing how they had met the 100 point requirement.

Required Action: Madison Consolidated Schools must ensure that all core subject teachers are highly qualified by having evidence that all teachers are highly qualified. Madison Consolidated Schools must maintain documentation (e.g., teaching licenses and either Praxis or HOUSSE documentation) for all staff that teach core academic subjects verifying how they have met the highly qualified requirement.

Information regarding Highly Qualified teachers and HOUSSE documentation can be found at the following website:

<http://www.doe.state.in.us/hqt/welcome.html>

Parents' Right-to-Know regarding request for teacher qualifications: Madison Consolidated Schools was able to demonstrate that the letter had been included in the student handbook at E.O. Muncie Elementary School. However, at Lydia Middleton this letter was not distributed to parents. This letter should be sent to all parents of students attending the Title I school informing the parents of their right to know about the qualifications of the student's classroom teacher and where relevant, paraprofessionals.

Required Action: Madison Consolidated Schools must ensure that all parents of students in Title I schools receive a Parents' Right-to-Know notification containing all required components. Lydia Middleton must send this letter to all parents and documentation of the mailing of this letter must be submitted to the IDOE by February 1, 2008.

Other Matters:

Professional qualification requirements for paraprofessionals: E.O. Muncie has allocated money for two Title I Instructional Support positions. At the time of the on-site visit, these individuals had not been hired. If these positions cannot be filled, an amendment should be filed to reallocate these funds.

5 percent set-aside: Madison Consolidated Schools did not reserve 5 percent of its allocation to support assisting teachers in reaching the professional qualification requirements. Madison Consolidated Schools thought all of the teachers had met these requirements and completed necessary documentation. Two of the randomly selected teachers had signed the HOUSSE documentation, but had not completed the document.

Required Action: Madison Consolidated Schools must ensure all teachers are highly qualified. Madison Consolidated Schools must help teachers complete HOUSSE documentation to determine if all staff are highly qualified. If any of the teachers are not highly qualified, an amendment must be completed to set-aside 5 percent of the allocation to help teachers become highly qualified.

Monitoring Topic 2: Compliance with Parental Involvement Requirements

Background

IDOE interviewed the Title I Program Administrator and building principals. In addition, IDOE reviewed policies and agendas, provided at the on-site.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Building schools' and parents' capacity for strong parental involvement: Madison Consolidated Schools showed evidence of building capacity with Title I parents.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

LEA Parent Involvement Policy: Madison Consolidated Schools showed evidence of a district parental involvement policy, which did not include all statutory components. (Attachment A)

Required Action: Madison Consolidated Schools must ensure that the district parental involvement policy is revised with parents and contains all statutory components. The LEA Parental Involvement Policy, along with sign-in sheets from staff and parents that developed this plan, must be submitted to the IDOE by February 1, 2008. The policy must thereafter be updated on an annual basis.

School Written Parental Involvement Policy and Compact: Madison Consolidated Schools does not have School Parental Involvement Policies that contain all required components. Although schools have parental involvement policies, a thorough review of E.O. Muncie and Lydia Middleton Elementary Schools revealed that the plans were identical. Essential components are missing from both the policies and the compacts. (See Attachments B and C)

Required Action: Madison Consolidated Schools must submit School Parental Involvement Policies including compacts for E.O. Muncie and Lydia Middleton Elementary Schools to the IDOE. Evidence must be submitted to the IDOE by February 1, 2008 showing the policies were developed with meaningful consultation with parents. Evidence must also be submitted to the IDOE that shows the policies were distributed to all Title I parents. Madison Consolidated Schools must ensure that the Parental Involvement Policies contain the necessary components as stated in Sec. 1118 in order to be in compliance with NCLB requirements. Parental Involvement Policies must be updated with parents annually. These policies should be specific to the individual school and reflect the unique activities occurring within the school.

Annual meeting: Madison Consolidated Schools showed evidence that all Title I schools held an annual meeting for Title I parents. However, the schools held these

meetings during the winter and spring. The meeting must occur early in the school year to inform parents about the Title I program.

Required Action: Madison Consolidated Schools must ensure that an annual meeting takes place at the beginning of each school year in order to inform Title I parents of the program(s) in which their children are involved. In addition, evidence of such meetings, such as, newsletter announcements, flyers, agendas, and sign-in sheets must be maintained as evidence, and must be submitted to IDOE.

Parent Information Resource Center (PIRC): Madison Consolidated Schools showed evidence of PIRC information being sent home through a newsletter at Lydia Middleton Elementary School. E.O. Muncie Elementary School was not able to provide evidence that they had made parents aware of the Parent Information Resource Centers in Indiana.

Required Action: Madison Consolidated Schools must provide parents with information about the Indiana Parent Information Resource Center at all Title I schools. Madison Consolidated Schools must submit evidence to the IDOE by February 1, 2008 that this information has been provided to parents at E.O. Muncie.

Review Effectiveness of Parental Involvement Activities: Madison Consolidated Schools could not provide evidence that there is ongoing review of the effectiveness of their parent involvement activities.

Required Action: Madison Consolidated Schools must evaluate the effectiveness of the parental involvement activities for Title I parents. Madison Consolidated Schools must send the IDOE a copy of the review of effectiveness for the 2007-2008 school year by May 5, 2008.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school choice and Supplemental Educational Services (SES).

Background

IDOE interviewed the Title I Program Administrator and principal at E.O. Muncie to discuss school improvement issues.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Strength

School Improvement Plan: Madison Consolidated Schools demonstrated that schools being identified for improvement develop or revise a school improvement plan within three months of being identified for improvement, with all statutory components, in consultation with school staff, parents, and outside experts. The plan is focused and thorough. Madison Consolidated Schools has a plan of implementation and schedule to ensure that the plan is being implemented with fidelity.

Areas of Compliance

Public School Choice: Madison Consolidated Schools provided evidence of mailing letters to parents informing them of E.O. Muncie Elementary School's improvement status and the option to transfer to another school. The letter was translated and sent to parents of limited English students.

Peer Review of School Improvement Plans: Madison Consolidated Schools did provide evidence of a peer review process for E.O. Muncie Elementary School's improvement plan.

Implementation of school improvement plan: Madison Consolidated Schools demonstrated that the district monitors the implementation of school improvement plans.

Recommendation: Madison Consolidated Schools had developed a school improvement plan that was thorough and based on scientific research. However documentation throughout the process was not saved. Documentation of meetings, as well as staff, parents, and teachers that participated should be collected when the plan is revised. Emails or memos regarding the implementation of the plan between the district and the school should also be maintained as records.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

None.

Monitoring Topic 4: Compliance with District Improvement Requirements

Background

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Areas of Compliance

Madison Consolidated Schools is not in LEA improvement.

Monitoring Topic 5: Compliance with Schoolwide Program Requirements

Background

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school, federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Areas of Compliance

Madison Consolidated Schools does not have a schoolwide program.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Background

IDOE interviewed the Title I Program Administrator and building principals regarding targeted assistance school program requirements.

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance

Methods and Instructional Strategies: Madison Consolidated Schools use methods and instructional strategies that are based on scientifically-based research. Reading Recovery is implemented at the first grade level. Literacy groups and after school tutoring is used in other grades to support students.

Coordination and Integration of Staff: Madison Consolidated Schools was able to demonstrate that Title I teachers coordinate with classroom teachers and are involved in the same professional development opportunities.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 6

Student Selection: Lydia Middleton and E.O. Muncie Elementary used multiple, educationally related criteria to determine the students who are the most academically at-risk to receive Title I services in each grade level. However, E.O. Muncie Elementary was selecting the most academically at-risk students per teacher.

Required Action: Madison Consolidated Schools must ensure that Title I services are only for those students identified by the student selection process as being most in need. Student selection should be done for the second semester at E.O. Muncie Elementary and students should be selected by grade level. Evidence of student selection with a student participation list must be provided to IDOE by February 1, 2008 from E.O. Muncie Elementary.

Monitoring Topic 7: Compliance with School Ranking and Serving Requirements

Background

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

Areas of Compliance

Ranking and serving: Madison Consolidated Schools demonstrated compliance with the statutory requirements for ranking and serving.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None.

Monitoring Topic 8: Compliance with Comparability Requirement

Background

IDOE interviewed the Title I Program Administrator regarding the Title I comparability requirement. The Comparability Report for 2006-2007 was due on November 15, 2006.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

Areas of Compliance

Comparability: Madison Consolidated Schools met compliance with comparability requirements.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None.

Monitoring Topic 9: Compliance with Maintenance of Effort

Background

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

Areas of Compliance

Madison Consolidated Schools is in compliance with the maintenance of effort requirement.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

None.

Monitoring Topic 10: Compliance with Equitable Services to Private School Students Requirements

Background

IDOE interviewed the Title I Program Administrator regarding compliance with nonpublic requirements. IDOE also spoke with one nonpublic principal via telephone.

Statutory Requirements: The equitable services requirements are contained in Section 1120.

Areas of Compliance

Consultation with Non-Public Officials: Madison Consolidated Schools was able to provide written documentation that consultation between the district and nonpublic schools begins in the spring as the Title I grant for the following year is being developed and continues throughout the school year.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10

Student Selection: Madison Consolidated Schools did not provide evidence that appropriate criteria were used to identify eligible students for Title I services.

Participating students were ranked in order of greatest need, but not all residentially eligible students were a part of the student selection.

Required Action: Madison Consolidated Schools must identify residentially eligible nonpublic school students for Title I services using multiple, educationally related, objective criteria, except that students in preschool through second grade can be identified solely on the basis of teacher or parent input, and developmentally appropriate measures. A copy of the student selection for the second semester must be provided to IDOE by February 1, 2008.

Evaluation of Program: Madison Consolidated Schools was not able to provide evidence that an evaluation of nonpublic school programs has been done.

Required Action: Madison Consolidated Schools must conduct an annual evaluation of each nonpublic Title I program. A summary of this evaluation must be sent to IDOE by May 5, 2008.

Monitoring Topic 11: Compliance with Statutory Set-aside

Background

IDOE interviewed the Title I Program Administrator and corporation treasurer regarding the Title I statutory set-aside requirements.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

Homeless students: Madison Consolidated Schools did not set aside money for homeless. The district relies on surveys to consolors to identify those students that are homeless.

1 Percent Parental Involvement: Madison Consolidated Schools provided evidence that one percent of the allocation for parental involvement was reserved and expended.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

None.

Other Matters:

5 percent set-aside for Highly Qualified Staff: This has been addressed under Monitoring Topic 1.

Monitoring Topic 12: Compliance with Supplement, not Supplant

Background

IDOE interviewed the Title I Program Administrator and corporation treasurer regarding the Title I supplement, not supplant requirements.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Area of Compliance

LEA guidance: Madison Consolidated Schools provided emails to school administrators regarding Title I services supplementing the general education program.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12

Targeted Assistance Program Expenditures: Madison Consolidated Schools was not able to provide evidence that expenditures for targeted assistance programs did not supplant non-federal resources.

Required Action: Madison Consolidated Schools must ensure that all expenditures supplement, not supplant. In addition, Madison Consolidated Schools must charge back a total of \$1,250.08 for kindergarten bags that were given to all kindergartens at all schools. This included students that were not eligible to receive services at both Title and Non-Title I schools. Documentation of the chargeback must be submitted to the IDOE.

Monitoring Topic 13: Compliance with Financial Management Systems Requirements

Background

IDOE interviewed the Title I Program Administrator and corporation treasurer regarding Madison Consolidated Schools' financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Audit Findings: Madison Consolidated Schools did not have any audit findings from Indiana State Board of Accounts regarding Title I.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

Financial Management and Procurement: Madison Consolidated Schools has a written policy for the procurement of items. Documentation of expenditures does not show that the process is always followed. Items are coded incorrectly on expenditure reports.

Required Action: Madison Consolidated Schools must ensure that the process of an expense going from the budget page to ordering and procurement is followed for all expenditures. The program administrator must sign off on all expenditures.

Internal Control and Time Distribution: IDOE found multiple instances where Madison Consolidated Schools lacked internal control. A hired consultant was coded incorrectly. This person was being paid out of indirect cost. The submitted expenditure report did not match the in-house reporting system of Madison Consolidated Schools. Deputy Elementary held an in-service in Pigeon Forge, Tennessee that was not approved in the application. Furthermore this activity consisted of staff participating in a DVD series for professional development. While the series may be an appropriate professional development, the travel out of state and overnight expenses does not fit the requirements of reasonable, allocable, and necessary.

Required Action: Madison Consolidated Schools must develop an internal control system. Madison Consolidated Schools must ensure a system is in place where by the Title I Program Administrator approves the Title I activities before payment is issued and the treasurer does not pay for any Title I activity unless it is an approvable expenditure in the application. The Title I Program Administrator and corporation treasurer must meet on a regular basis to ensure that purchases and budgets are in compliance. If activities arise that are not in the original application, Madison Consolidated Schools must submit an amendment to their application prior to making the expenditure.

In addition, Madison Consolidated Schools must charge back a total of \$1,053.45 for a retreat that was held in Pigeon Forge, Tennessee in June 2007. Documentation of the chargeback must be submitted to the IDOE.

Contracted Services: Madison Consolidated Schools did not show evidence that contracts contained all required components.

Required Action: Madison Consolidated Schools must ensure that all contracts include the required components (Attachment D). Current contracts must be amended to include all required components.

Monitoring Topic 14 Compliance with compensation for personnel services requirements

Background

IDOE interviewed the Title I Program Administrator as well as the principals of two schools in regard to the compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Areas of Compliance:

Compensation for personnel services requirements: Madison Consolidated Schools was able to demonstrate sufficient compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14

None.

Monitoring Topic 15: Compliance with complaint procedures

Background

IDOE interviewed the Title I Program Administrator regarding the complaint process.

Areas of Compliance

Complaint Process: Madison Consolidated Schools was able to demonstrate that the district has a complaint procedure. No complaints have been filed.

Recommendation: IDOE recommends that Madison Consolidated Schools consider placing the complaint policy in the school handbook. It is a part of the board policy located at the district and available at the schools, but was difficult for staff to locate. Including the policy in the handbook will make it more assessable to parents.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15

None.

Monitoring Topic 16: Compliance with equipment requirements – OMB A-87 and EDGAR 80.36

Background

IDOE interviewed the Title I Program Administrator, corporation treasurer and two school principals regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Disposition of Equipment: Madison Consolidated Schools showed evidence of a disposition policy.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16

Equipment and Technology Inventory: Madison Consolidated Schools did not provide inventory lists that meet the requirements of EDGAR 80.32. Madison Consolidated Schools had only purchased equipment at the delinquent institution.

Required Action: Madison Consolidated Schools must develop an inventory list to include all material purchased. In addition, the completed inventory list must be submitted to the IDOE by February 1, 2008. The location of the equipment must be identified on the inventory list.

Labeling of supplies: Madison Consolidated Schools did not show evidence that equipment and supplies purchased with Title I funds was properly labeled and identified.

Required Action: Madison Consolidated Schools must ensure that all nonexpendable supplies, equipment, and inventory is properly labeled.

Monitoring Topic 17: Compliance with Neglected Institutions: Funded through Title I, Part A

Background

IDOE interviewed the Title I Administrator regarding compliance with neglected institutions.

Definition of facility: A public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardian.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 17

Highly Qualified Staff: Madison Consolidated Schools was unable to provide evidence that individuals working within the neglected institution met the highly qualified requirements.

Required Action: Madison Consolidated Schools must submit evidence to IDOE that all individuals hired with Title I funds meet the requirements of highly qualified.

Implementation of Services and consultation: Madison Consolidated Schools did not provide evidence that meaningful and on-going consultation takes place with the neglected institution.

Required Action: Madison Consolidated Schools must provide IDOE with a plan to ensure that on-going consultation is occurring with the neglected institution's official. Madison Consolidated Schools must have direct oversight of the program.

Monitoring Topic 18: Compliance with Delinquent Institutions: Funded through Title I, Part D, Subpart 2

Background

IDOE interviewed the Title I Program Administrator regarding a delinquent institution funded through Title I, Part D, Subpart 2.

Definition of facility: A public or private residential facility for the care of children who have been adjudicated to be delinquent or in need of supervision.

The purpose of this subpart is to support the operation of local educational agency programs that involve collaboration with locally operated correctional facilities—

(1) to carry out high quality education programs to prepare children and youth for secondary school completion, training, employment, or further education;

(2) to provide activities to facilitate the transition of such children and youth from the correctional program to further education or employment; and

(3) to operate programs in local schools for children and youth returning from correctional facilities, and programs which may serve at-risk children and youth.

Districts that conduct a program under Title I for children and youth who are N or D are required to:

- Meet the educational needs of neglected, delinquent, and at-risk children and youth, and assist in the transition of these students from correctional facilities to locally operated programs
- Ensure that these students have the same opportunities to achieve as if they were in local schools in the State.

To receive Subpart 2 funds, each eligible LEA must apply to the SEA as outlined in section 1423 of ESEA. An LEA application must include (1) a description of the program(s) to be assisted with the Subpart 2 funds, and (2) a description of the formal agreements, regarding the program to be assisted, between the LEA and the local correctional facilities and alternative school programs that serve children and youth involved with the juvenile justice system.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 18

Highly Qualified Staff: Madison Consolidated Schools was unable to provide evidence that individuals working within the delinquent institution met the highly qualified requirements.

Required Action: Madison Consolidated Schools must submit evidence to IDOE that all individuals hired with Title I funds meet the requirements of highly qualified.

Consultation: Madison Consolidated Schools could not provide evidence that timely and meaningful consultation occurs between Madison Consolidated Schools and the delinquent institution.

Required Action: Madison Consolidated Schools must provide IDOE with a plan to ensure that on-going consultation is occurring with the delinquent institution's official. Written documentation must be maintained. Madison Consolidated Schools must have direct oversight of the program.

Awareness of students with special needs: Madison Consolidated Schools did not ensure that individuals working with youth were aware if a child had an existing individualized education plan (IEP).

Required Action: Madison Consolidated Schools must develop a plan to ensure that staff working directly with students with individualized education plans are made aware of the relevant information relating to services provided through Title I.

Other Matters:

Accurate count: The documentation provided to the IDOE showing verification of the number of students at the delinquent facility did not match the number provided on the annual survey of children in local institutions for delinquent children. The documentation provided for the on-site monitoring showed more students were residing in the facility for 30 or more consecutive days, with at least one of which was in the month of October, than were reported on the survey. IDOE recommends that Madison Consolidated Schools work with the officials at the institution to report all eligible children.

Attachment A

Local Educational Agency (LEA) Parental Involvement Policy: Sec. 1118 (a) (2) Each LEA shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall describe how the agency will:

Parental Involvement Policy Requirements:	Found on Page #
1. Involve parents in the joint development of the plan and the process of school review and improvement	Yes
2. Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance	Yes
3. Build the schools' and parents' capacity for strong parental involvement by <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement <input type="checkbox"/> Coordination and integrating parental involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Other reasonable support for parental involvement activities under section 1118 as parents may request 	1. Yes 2. Yes 3. Yes 4. yes 5. Yes 6. No
4. Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs	Yes
5. Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies	Yes
6. Involve parents in the activities of the schools served under Title I	Yes

Attachment B

School Parent Involvement Policy Checklist

School Parental Involvement Policy: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy Same policy at E.O. Muncie and Lydia Middleton	Found on Page #
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	Yes
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	Yes
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	Yes
4. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible 	1. Yes 2. Yes 3. No
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	N/A
6. Includes a School-Parent Compact (see checklist next page)	Yes
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request 	1. No 2. No 3. Yes 4. No 5. No 6. No

Attachment C

School – Parent Compact Checklist

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include: Same policy at E.O. Muncie and Lydia Middleton	Found on Page #
1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	No- (supportive and effective learning environment)
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"><input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement<input type="checkbox"/> Frequent reports to parents on their children's progress<input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities	1. No 2. Yes 3. No

Attachment D

Contracts must include:

- Description of services to be performed or goods to be delivered
- Description of dates when services will be performed or goods delivered
- Description of locations where services will be performed or goods delivered
- Description of number of students/teachers/ etc. to be served (if applicable)
- Conditions for termination of contract